

**REMARKS**

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

**Disposition of Claims**

Claims 1-40 are pending in this application. Claims 1, 10, 25 and 35 are independent. The remaining claims depend, directly or indirectly, from claims 1, 10, 25, and 35.

**Objection(s)**

Claim 21 is objected to by the Examiner because of improper dependency language. In accordance with the Examiner's suggestion, the word "any" has been deleted from the claim. Accordingly, withdrawal of this objection is respectfully requested.

**Rejections under 35 U.S.C. § 102**

Claims 1-5, 8-14, 17, 20, 22-29, 32-37, and 40 stand rejected under 35 U.S.C. § 102(b) as anticipated by WO 97/46008 ("Blatter"). Claims 1, 25, and 35 have been amended by this reply to clarify the present invention recited. To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed.

The present invention relates to a decoder for processing a transport packet stream. Specifically, the decoder disclosed is configured to filter packetised data encapsulated in packet payloads to extract data associated with a particular security module system (and particularly, data associated with a conditional access system within the security module system). The extracted data is subsequently filtered using filter data that is received from a portable security module (*e.g.*, Figure 2, a smartcard within the decoder (30)). Therefore, the present invention includes two levels of filtering; one based on the packet header information to extract data specific to the conditional access system, and a subsequent filtering process to filter the extracted data (see, *e.g.*, pages 5-6 of the specification). Because the decoder may be configured to extract data relating to the particular conditional access system within the security module, the decoder can be customized based on specific types of security module systems.

In contrast to the present invention, Blatter relates to processing of digital data and program guide information. Specifically, Blatter discloses selecting a program, identifying packets corresponding to the selected program, and forming a datastream representing the selected program based on the packets and some condensed program specified information. As can clearly be seen in Figure 1 of Blatter, the transport system (25) shown receives input from a decoder (30) and includes within the transport system several other decoders which decode compressed data to display as output (*e.g.*, video/audio decoders 80 and 85 of Figure 1 in Blatter). However, the present invention is embodied in a decoder, illustrated, for example, in Figure 6 and in the preamble of all the independent claims. Specifically, the present invention configures a decoder (as recited in claim 1) to perform all the functionalities described above. Therefore, Applicant respectfully asserts that Blatter cannot possibly anticipate the present invention.

Specifically addressing the claims, claim 1 has been amended to include a limitation reciting a first and second means for filtering packetised data. Specifically, as described above with respect to the present invention, the decoder disclosed provides two levels of filtering. The first filtering process filters the packetised data based on the header information of the packet payloads to extract data associated with the particular security module system. The first filtering process may be configured based on an identifier corresponding to the particular security module system located within the header information of the packet payloads. Further, the second filtering process filters the extracted data using filter data received from the portable security module (*e.g.*, a smartcard).

Blatter does not disclose or suggest two distinct filtering processes. Rather, Blatter discloses PID detection filters that match PIDs of incoming packets with PID values pre-loaded in control registers. The pre-loaded PIDs are used by filters to identify the data packets that are to be stored and data packets that are to be decoded (see, *e.g.*, page 7, ll. 18-23). Filtering based on PID values is the only filtering process disclosed by Blatter. The Examiner refers to page 10, ll. 10-15 of Blatter in pointing out the first filtering means for extracting data associated with a particular security module from the packetised data. However, the PSI information used to recognized packets that are destined for the controller buffer disclosed in Blatter is *not* a separate filtering process from that described above with respect to the PID detection filters. Further, Blatter does not disclose filtering to extract some data, and then filtering the extracted data, as

recited in amended claim 1. Thus, it is clear that Blatter does not disclose or suggest the two filtering processes that occur within the decoder of the present invention.

In view of the above, Blatter does not disclose or suggest each and every element as recited in amended claim 1 of the present invention. Thus, amended claim 1 is patentable over Blatter. Dependent claims 2-9 are patentable for at least the same reasons. Further, independent claim 10 contains similar allowable subject matter (*i.e.*, means for two filtering processes as explained above), and independent claims 25 and 35 have been amended to contain similar allowable subject matter. Thus, the independent claims are all patentable over Blatter for at least the same reasons described above. Dependent claims 11-24, 26-34, and 36-40 are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

### **Rejections under 35 U.S.C. § 103**

Claims 6, 7, 30, and 31 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Blatter in view of U.S. Patent No. 6,237,145 ("Narasimhan"). Claims 1 and 25 have been amended by this reply. To the extent that this rejected still applies to the amended claims, this rejection is respectfully traversed.

Claims 1 and 25 have been amended to include a two levels of filtering as described above. Blatter does not disclose or suggest each and every limitation of the amended claims. Specifically, Blatter does not disclose a decoder that performs two levels of filtering. Further, Narasimhan does not disclose that which Blatter lacks.

Narasimhan teaches a system for accessing and displaying promotion information and for generating redeemable coupons. Narasimhan does not disclose or suggest a decoder for processing a transport processing stream configured to perform two filtering processes. Further, those skilled in the art would not combine Blatter and Narasimhan because Blatter is related to processing a packetized datastream representing a program and Narasimhan relates to using a consumer profile in a system configured to access and display promotion information associated with discount coupons and other similar "tokens" to generate redeemable coupons. The two references are non analogous art and do not even remotely relate to the same area of technology.

In view of the above, Blatter and Narasimhan, whether considered separately or in combination, do not render the present invention obvious. Thus, claims 1 and 25, and respective dependent claims 6, 7, 30, and 31 are patentable over Blatter and Narasimhan. Accordingly, withdrawal of this rejection is respectfully requested.

Claim 16 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Blatter in view of U.S. Patent No. 6,091,772 ("Anderson"). This rejection is respectfully traversed. As described above, Blatter does not disclose a decoder according to claim 13. Specifically, Blatter does not disclose a system embodied in a decoder for processing a transport packet stream using two levels of filtering. Further, Anderson does not teach that which Blatter lacks.

Anderson discloses a method of decoding an MPEG-2 compliant packetized datastream containing transport table sections. Although Anderson does disclose using a decoder, the decoder of Anderson is associated with a compression or inner layer of a MPEG-2 bitstream. The invention of Anderson is not embodied completely in a decoder, as is disclosed in the present invention. Anderson also does not disclose or suggest two levels of filtering based on information from a security module as described in the present invention. Thus, Blatter and Anderson, whether viewed separately or in combination, fail to render the present invention obvious. Accordingly, withdrawal of this rejection is respectfully requested.

Lastly, claims 15, 18, 19, 21, 38, and 39 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Blatter in view of "Functional Model of Conditional Access System", EBU Project Group ("EBU").

As previously asserted, Blatter fails to disclose or suggest a decoder according to claim 13 (see above) where a first and second filtering process is performed on packetised data. Further EBU does not disclose or suggest that which Blatter lacks. Specifically, EBU relates to a model of a conditional access system, which is used in the present invention as a security module that provides an identifier used by the decoder to filter the packetised data. EBU fails to disclose or suggest a decoder configured to use the information associated with the conditional access system to perform the filtering processes as described above and recited in the amended claims. Thus, Blatter and EBU, whether considered separately or in combination, fail to render the

present invention obvious, and the claims are patentable over Blatter and EBU. Accordingly, withdrawal of this rejection is respectfully requested.

### Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 11345/018001; CPT90813).

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Respectfully submitted,

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